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6 **BRAD DEMITROPOULOS**

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 ★★★★★

11 DENISE ABBEY, individually, and
as special administrator of the ESTATE
12 OF MICAH ABBEY,

Case No.: 3:13-cv-00347-LRH-VPC

13 Plaintiffs,

14 vs.

DEFENDANT DEMITROPOULOS'
AMENDED ANSWER TO THIRD
AMENDED COMPLAINT AND
DEMAND FOR JURY TRIAL

15 CITY OF RENO; RENO POLICE
16 DEPARTMENT; KEITH PLEICH individually
and in his official capacity as a Police Officer
17 for CITY OF RENO AND RENO POLICE
DEPARTMENT; DANIEL BOND individually
18 and in his official Capacity as a Police Officer
for CITY OF RENO and RENO POLICE
19 DEPARTMENT; SCOTT RASMUSSEN
Individually and in his official Capacity as a
20 Police Officer for CITY OF RENO and RENO
POLICE DEPARTMENT; BRAD
21 DEMITROPOULOS; BOARD OF REGENTS
22 FOR THE NEVADA SYSTEM OF HIGHER
EDUCATION ON BEHALF OF THE
23 UNIVERSITY OF NEVADA, RENO; and
DOES I through X, inclusive,

24 _____
Defendants. /

25
26 Defendant Brad Demitropoulos (hereinafter, "Demitropoulos") hereby amends
27 his answers to Plaintiffs' Third Amended Complaint as follows:

28 ///

INTRODUCTION

1
2 1. Responding to paragraph 1, Demitropoulos denies that there was a
3 wrongful death or that it occurred at his hands. Demitropoulos lacks sufficient
4 information to form a belief as to the truth of the allegations of this paragraph, and
5 therefore denies the same.

JURISDICTION AND VENUE

6
7 2. Responding to paragraph 2, Demitropoulos denies the existence of any
8 valid claims for civil rights violations or wrongful death under the statutes referenced in
9 this paragraph, under other statutes, or under the common law.

10 3. Responding to paragraph 3, Demitropoulos admits that he is a resident
11 of the District of Nevada, but lacks sufficient information to form a belief as to the truth
12 of the remaining allegations of this paragraph, and therefore denies the same.

PARTIES

13
14 4. Responding to paragraph 4, Demitropoulos lacks sufficient information to
15 form a belief as to the truth of the allegations of this paragraph, and therefore denies the
16 same.

17 5. Responding to paragraph 5, Demitropoulos lacks sufficient information to
18 form a belief as to the truth of the allegations of this paragraph, and therefore denies the
19 same.

20 6. Responding to paragraph 6, the allegations of this paragraph do not
21 apply to this answering Defendant, such that no response is necessary. Should the
22 allegations of this paragraph be interpreted to apply to Demitropoulos, they are
23 expressly denied.

24 7. Responding to paragraph 7, the allegations of this paragraph do not
25 apply to this answering Defendant, such that no response is necessary. Should the
26 allegations of this paragraph be interpreted to apply to Demitropoulos, they are
27 expressly denied.

28 8. Demitropoulos admits the allegations of paragraph 8.

1 18. Responding to paragraph 18, Demitropoulos believes the allegations of
2 this paragraph to be true, based upon information received from subsequent
3 investigative reports, and therefore admits the same.

4 19. Responding to paragraph 19, Demitropoulos denies that at the time of the
5 occurrences alleged in the complaint he knew or should have known of Micah Abbey's
6 alleged mental, physical and emotional conditions. Demitropoulos lacks sufficient
7 information to form a belief as to the truth of the remaining allegations of this paragraph,
8 and therefore denies the same.

9 20. Responding to paragraph 20, Demitropoulos believes the allegations of
10 this paragraph to be true, based upon information received from subsequent
11 investigative reports, and therefore admits the same.

12 21. Responding to paragraph 21, Demitropoulos believes the allegations of
13 this paragraph to be true, based upon information received from subsequent
14 investigative reports, and therefore admits the same.

15 22. Responding to paragraph 22, Demitropoulos believes the allegations of
16 this paragraph to be true, based upon information received from subsequent
17 investigative reports, and therefore admits the same.

18 23. Responding to paragraph 23, Demitropoulos believes the allegation that
19 Defendant Pleich arrived at the residence at approximately 7:56 to be true, based upon
20 information received from subsequent investigative reports, and therefore admits the
21 same. Demitropoulos lacks sufficient information to form a belief as to the truth of the
22 remaining allegations of this paragraph, and therefore denies the same.

23 24. Responding to paragraph 24, Demitropoulos lacks sufficient information to
24 form a belief as to the truth of the allegations of this paragraph, and therefore denies the
25 same.

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1 25. Responding to paragraph 25, Demitropoulos lacks sufficient information to
2 form a belief as to the truth of the allegations of this paragraph, and therefore denies the
3 same.

4 26. Responding to paragraph 26, Demitropoulos lacks sufficient information to
5 form a belief as to the truth of the allegations of this paragraph, and therefore denies the
6 same.

7 27. Responding to paragraph 27, Demitropoulos lacks sufficient information to
8 form a belief as to the truth of the allegations of this paragraph, and therefore denies the
9 same.

10 28. Responding to paragraph 28, Demitropoulos believes the allegation that
11 Defendant Bond arrived at the residence at approximately 8:06 to be true, based upon
12 information received from subsequent investigative reports, and therefore admits the
13 same. Demitropoulos lacks sufficient information to form a belief as to the truth of the
14 remaining allegations of this paragraph, and therefore denies the same.

15 29. Responding to paragraph 29, Demitropoulos denies the allegations of
16 this paragraph.

17 30. Responding to paragraph 30, Demitropoulos lacks sufficient information to
18 form a belief as to the truth of the allegations of this paragraph, and therefore denies the
19 same.

20 31. Responding to paragraph 31, Demitropoulos believes the allegation that
21 Abbey refused to go and resisted to be true, based upon subsequent investigative
22 reports, and therefore admits the same. Demitropoulos lacks sufficient information to
23 form a belief as to the truth of the remaining allegations of this paragraph, and therefore
24 denies the same.

25 32. Responding to paragraph 32, Demitropoulos believes the allegation that
26 Abbey attempted to escape through a window of his bedroom to be true based upon
27 subsequent investigative reports, and therefore admits the same. Demitropoulos lacks
28

1 sufficient information to form a belief as to the truth of the remaining allegations of this
2 paragraph, and therefore denies the same.

3 33. Responding to paragraph 33, Demitropoulos believes the allegation that
4 Abbey attempted to escape through a window of his bedroom to be true based on
5 subsequent investigative reports, and therefore admits the same. Demitropoulos lacks
6 sufficient information to form a belief as to the truth of the remaining allegations of this
7 paragraph, and therefore denies the same.

8 34. Responding to paragraph 34, Demitropoulos denies the allegations of
9 this paragraph insofar as they pertain to him, but admits that he used only reasonable,
10 lawful, and justified levels of force as required by Abbey's actions. Demitropoulos
11 lacks sufficient information to form a belief as to the truth of the allegations of this
12 paragraph insofar as they pertain to others, and therefore denies the same.

13 35. Responding to paragraph 35, Demitropoulos denies all of the allegations
14 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
15 information to form a belief as to the truth of the allegations of this paragraph insofar
16 as they pertain to others, and therefore denies the same.

17 36. Responding to paragraph 36, Demitropoulos denies all of the allegations
18 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
19 information to form a belief as to the truth of the allegations of this paragraph insofar
20 as they pertain to others, and therefore denies the same.

21 37. Responding to paragraph 37, Demitropoulos denies all of the allegations
22 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
23 information to form a belief as to the truth of the allegations of this paragraph insofar
24 as they pertain to others, and therefore denies the same.

25 38. Responding to paragraph 38, Demitropoulos denies all of the allegations
26 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
27 information to form a belief as to the truth of the allegations of this paragraph insofar
28 as they pertain to others, and therefore denies the same.

1 39. Responding to paragraph 39, Demitropoulos denies all of the allegations
2 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
3 information to form a belief as to the truth of the allegations of this paragraph insofar
4 as they pertain to others, and therefore denies the same.

5 40. Responding to paragraph 40, Demitropoulos denies all of the allegations
6 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
7 information to form a belief as to the truth of the allegations of this paragraph insofar
8 as they pertain to others, and therefore denies the same.

9 41. Responding to paragraph 41, Demitropoulos admits that he briefly
10 assisted in controlling Abbey's legs by crossing them and holding them in place, but
11 denies all of the remaining allegations insofar as they pertain to him. Demitropoulos
12 lacks sufficient information to form a belief as to the allegations of this paragraph
13 insofar as they pertain to others, and therefore denies the same.

14 42. Responding to paragraph 42, Demitropoulos admits he briefly assisted in
15 controlling Abbey's legs by crossing them and holding them in place until Defendant
16 Rasmussen arrived to apply RIPP restraints. Demitropoulos believes the allegation
17 that Defendant Rasmussen arrived at approximately 8:24 pm to be true based upon
18 subsequent investigative reports, and therefore admits the same. Demitropoulos
19 denies all of the remaining allegations of this paragraph insofar as they pertain to him.
20 Demitropoulos lacks sufficient information to form a belief as to the truth of the
21 remaining allegations of this paragraph insofar as they pertain to others, and therefore
22 denies the same.

23 43. Responding to paragraph 43, Demitropoulos denies all of the allegations
24 of this paragraph insofar as they pertain to him. Demitropoulos admits that other
25 officers removed the RIPP restraints and handcuffs and commenced cardio pulmonary
26 resuscitation until medical units arrived and took over. Demitropoulos lacks sufficient
27 information to form a belief as to the truth of the remaining allegations of this
28 paragraph insofar as they pertain to others, and therefore denies the same.

1 44. Responding to paragraph 44, Demitropoulos believes the allegations of
2 this paragraph to be true, based upon information received from subsequent
3 investigative reports, and therefore admits the same.

4 45. Responding to paragraph 45, Demitropoulos denies the allegations of
5 this paragraph because they inaccurately set forth the full and complete findings.

6 46. Responding to paragraph 46, Demitropoulos denies all of the allegations
7 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
8 information to form a belief as to the truth of the allegations of this paragraph insofar
9 as they pertain to others, and therefore denies the same.

10 47. Responding to paragraph 47, Demitropoulos admits that he was acting
11 under color of law at all times relevant hereto.

12 48. Responding to paragraph 48, Demitropoulos denies all of the allegations
13 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
14 information to form a belief as to the truth of the allegations of this paragraph insofar
15 as they pertain to others, and therefore denies the same.

16 49. Responding to paragraph 49, Demitropoulos denies all of the allegations
17 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
18 information to form a belief as to the truth of the allegations of this paragraph insofar
19 as they pertain to others, and therefore denies the same.

20 50. Responding to paragraph 50, Demitropoulos denies all of the allegations
21 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
22 information to form a belief as to the truth of the allegations of this paragraph insofar
23 as they pertain to others, and therefore denies the same.

24 51. Responding to paragraph 51, Demitropoulos denies all of the allegations
25 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
26 information to form a belief as to the truth of the allegations of this paragraph insofar
27 as they pertain to others, and therefore denies the same.

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1 information to form a belief as to the truth of the allegations of this paragraph insofar
2 as they pertain to others, and therefore denies the same.

3 59. Responding to paragraph 59, Demitropoulos denies all of the allegations
4 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
5 information to form a belief as to the truth of the allegations of this paragraph insofar
6 as they pertain to others, and therefore denies the same.

7 **COUNT II**

8 **42 U.S.C. § 1983**

9 **(CITY, RPD AND DOES I-X)**

10 60. Responding to paragraph 60, Demitropoulos adopts by reference and
11 incorporates herein all of his responses to paragraphs 1 through 59 inclusive, as if set
12 forth in full at this point.

13 61. Responding to paragraph 61, Demitropoulos denies all of the allegations
14 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
15 information to form a belief as to the truth of the allegations of this paragraph insofar
16 as they pertain to others, and therefore denies the same.

17 62. Responding to paragraph 62, the allegations of this paragraph do not
18 apply to this answering Defendant, such that no response is necessary. Should the
19 allegations of this paragraph be interpreted to apply to Demitropoulos, they are
20 expressly denied.

21 63. Responding to paragraph 63, the allegations of this paragraph do not
22 apply to this answering Defendant, such that no response is necessary. Should the
23 allegations of this paragraph be interpreted to apply to Demitropoulos, they are
24 expressly denied.

25 64. Responding to paragraph 64, Demitropoulos denies all of the allegations
26 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
27 information to form a belief as to the truth of the allegations of this paragraph insofar
28 as they pertain to others, and therefore denies the same.

1 65. Responding to paragraph 65, Demitropoulos denies all of the allegations
2 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
3 information to form a belief as to the truth of the allegations of this paragraph insofar
4 as they pertain to others, and therefore denies the same.

5 66. Responding to paragraph 66, the allegations of this paragraph do not
6 apply to this answering Defendant, such that no response is necessary. Should the
7 allegations of this paragraph be interpreted to apply to Demitropoulos, they are
8 expressly denied.

9 67. Responding to paragraph 67, Demitropoulos denies all of the allegations
10 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
11 information to form a belief as to the truth of the allegations of this paragraph insofar
12 as they pertain to others, and therefore denies the same.

13 68. Responding to paragraph 68, the allegations of this paragraph do not
14 apply to this answering Defendant, such that no response is necessary. Should the
15 allegations of this paragraph be interpreted to apply to Demitropoulos, they are
16 expressly denied.

17 69. Responding to paragraph 69, the allegations of this paragraph do not
18 apply to this answering Defendant, such that no response is necessary. Should the
19 allegations of this paragraph be interpreted to apply to Demitropoulos, they are
20 expressly denied.

21 **COUNT III**

22 **NEGLIGENCE**

23 **(ALL DEFENDANTS)**

24 70. Responding to paragraph 70, Demitropoulos adopts by reference and
25 incorporates herein all of his responses to paragraphs 1 through 69 inclusive, as if set
26 forth in full at this point.

27 71. Responding to paragraph 71, Demitropoulos denies all of the allegations
28 of this paragraph insofar as they pertain to him, but admits that he acted at all times

1 with due care. Demitropoulos lacks sufficient information to form a belief as to the
2 truth of the allegations of this paragraph insofar as they pertain to others, and
3 therefore denies the same.

4 72. Responding to paragraph 72, Demitropoulos denies all of the allegations
5 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
6 information to form a belief as to the truth of the allegations of this paragraph insofar
7 as they pertain to others, and therefore denies the same.

8 73. Responding to paragraph 73, Demitropoulos denies all of the allegations
9 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
10 information to form a belief as to the truth of the allegations of this paragraph insofar
11 as they pertain to others, and therefore denies the same.

12 74. Responding to paragraph 74, Demitropoulos denies all of the allegations
13 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
14 information to form a belief as to the truth of the allegations of this paragraph insofar
15 as they pertain to others, and therefore denies the same.

16 75. Responding to paragraph 75, Demitropoulos denies all of the allegations
17 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
18 information to form a belief as to the truth of the allegations of this paragraph insofar
19 as they pertain to others, and therefore denies the same.

20 76. Responding to paragraph 76, Demitropoulos denies all of the allegations
21 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
22 information to form a belief as to the truth of the allegations of this paragraph insofar
23 as they pertain to others, and therefore denies the same.

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COUNT IV

ASSAULT AND BATTERY

(ALL DEFENDANTS)

77. Responding to paragraph 77, Demitropoulos adopts by reference and incorporates herein all of his responses to paragraphs 1 through 76 inclusive, as if set forth in full at this point.

78. Responding to paragraph 78, Demitropoulos denies all of the allegations of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient information to form a belief as to the truth of the allegations of this paragraph insofar as they pertain to others, and therefore denies the same.

79. Responding to paragraph 79, Demitropoulos denies all of the allegations of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient information to form a belief as to the truth of the allegations of this paragraph insofar as they pertain to others, and therefore denies the same.

COUNT V

WRONGFUL DEATH

(ALL DEFENDANTS)

80. Responding to paragraph 80, Demitropoulos adopts by reference and incorporates herein all of his responses to paragraphs 1 through 80 inclusive, as if set forth in full at this point.

81. Responding to paragraph 81, Demitropoulos lacks sufficient information to form a belief as to the truth of the allegations of this paragraph, and therefore denies the same.

82. Responding to paragraph 82, Demitropoulos denies that Plaintiffs have standing to bring an action on behalf of others not named as plaintiffs to this action.

83. Responding to paragraph 83, Demitropoulos denies all of the allegations of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient

1 information to form a belief as to the truth of the allegations of this paragraph insofar
2 as they pertain to others, and therefore denies the same.

3 84. Responding to paragraph 84, Demitropoulos denies all of the allegations
4 of this paragraph insofar as they pertain to him. Demitropoulos lacks sufficient
5 information to form a belief as to the truth of the allegations of this paragraph insofar
6 as they pertain to others, and therefore denies the same.

7 **AFFIRMATIVE DEFENSES**

8 As and for his Affirmative Defenses, Defendant alleges and avers as
9 follows:

10 **First Affirmative Defense**

11 The Third Amended Complaint fails to state any claim upon which
12 relief can be granted in favor of the Plaintiffs or against the Defendant.

13 **Second Affirmative Defense**

14 At all times and places relevant hereto, Defendant acted in good faith,
15 with justification and probable cause, and without malice toward the decedent or
16 Plaintiffs.

17 **Third Affirmative Defense**

18 Plaintiffs are estopped by decedent's own conduct from maintaining
19 any of the claims for relief set forth in the Third Amended Complaint.

20 **Fourth Affirmative Defense**

21 Plaintiffs' decedent has waived each of the claims for relief set forth in
22 the Third Amended Complaint, which waiver is imputed to Plaintiffs.

23 **Fifth Affirmative Defense**

24 Plaintiffs' suit is barred by the doctrine of unclean hands.

25 **Sixth Affirmative Defense**

26 The claims for relief in the Third Amended Complaint allege acts or omissions
27 of employees or agents of the University of Nevada, Reno that occurred in the
28 execution of a statute, ordinance or other legal regulation, while exercising due care,

1 and are therefore barred by NRS 41.032.

2 **Seventh Affirmative Defense**

3 NRS 41.035 limits the amount of recovery against an employee of a political
4 subdivision of the State of Nevada and to \$100,000.00.

5 **Eighth Affirmative Defense**

6 The claims for relief in the Third Amended Complaint allege performance or
7 non-performance of discretionary functions within the scope of Defendant's official
8 duties and are therefore barred by NRS 41.032.

9 **Ninth Affirmative Defense**

10 Punitive or exemplary damages are barred by NRS 41.035.

11 **Tenth Affirmative Defense**

12 Defendant is entitled to qualified good faith immunity.

13 **Eleventh Affirmative Defense**

14 The actions of the Defendant were privileged.

15 **Twelfth Affirmative Defense**

16 Without admitting that the decedent's civil rights were violated in any fashion,
17 Defendant is shielded from liability for civil damages, because Defendant's alleged
18 conduct, as set forth in the Third Amended Complaint, did not violate clearly established
19 statutory and/or constitutional rights of which a reasonable person would have known.

20 **Thirteenth Affirmative Defense**

21 Defendant is informed and believes and thereupon avers that at all times and
22 places relevant hereto Plaintiffs' decedent was negligent, at fault and otherwise
23 responsible for the matters which are the subject of this litigation, with such
24 negligence, fault or responsibility proximately causing and contributing to any alleged
25 injuries and damages, and with such negligence being imputed to Plaintiffs.

26 **Fourteenth Affirmative Defense**

27 1. Defendant adopts by reference and incorporates herein the preceding
28 affirmative defense.

1 employees were within the jurisdiction of their official authority and were done by virtue
2 of and under the laws of the State of Nevada.

3 **Nineteenth Affirmative Defense**

4 Without admitting that punitive damages are appropriate in this case, Defendant
5 avers that fairness and justice require that Plaintiffs prove a claim for punitive damages
6 by clear and convincing evidence.

7 **Twentieth Affirmative Defense**

8 Without admitting the Plaintiffs are entitled to punitive damages, punitive
9 damages constitute excessive fines prohibited by the United States and Nevada
10 Constitutions. Further, NRS 42.010 does not provide adequate standards and/or
11 safeguards for its application and is therefore void for vagueness under the due process
12 clause of the Fourteenth Amendment to the United States Constitution and in
13 accordance with Article 1, §8 of the Nevada Constitution.

14 **Twenty-First Affirmative Defense**

15 The State of Nevada has reserved its immunity from suit under the Eleventh
16 Amendment to the United States Constitution, with such immunity extending to political
17 subdivisions of the State. Therefore, the University and its employees who are sued in
18 their official capacities are immune from suit for any claims asserted under 42 U.S.C. §
19 1983.

20 Pursuant to the provisions of Rule 11 of the Federal Rules of Civil Procedure, at
21 the time of the filing of Defendant's answer, all possible affirmative defenses may not
22 have been alleged inasmuch as insufficient facts and other relevant information may not
23 have been available after reasonable inquiry, and therefore, Defendant reserves the
24 right to amend this answer to allege additional affirmative defenses if subsequent
25 investigation warrants the same.

26 WHEREFORE, this answering Defendant requests the following:

- 27 1. That judgment be entered in favor of Defendant on each of the causes of
28 action and claims set forth in the Third Amended Complaint;
2. That Plaintiffs take nothing by reason of the Third Amended Complaint;

4. That Defendant be awarded his reasonable costs incurred in defending this matter;

Respectfully submitted, this 30th day of October, 2013.

/S/ Gary A. Cardinal
GARY A. CARDINAL
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(775) 784-3495
Attorney for Defendant
BRAD DEMITROPOULOS

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the University of Nevada, Reno, over the age of eighteen years, that I am not a party to the within action, and that on the 30th day of October, 2013, I electronically filed the foregoing **DEFENDANT DEMITROPOULOS' AMENDED ANSWER TO THIRD AMENDED COMPLAINT**, with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the listed parties below and served the following parties by U.S. mail, postage prepaid, addressed to:

Richard A. Salvatore, Esq.
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/s/ Michelle A. Ene
Employee of the University of Nevada, Reno